

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

JARED REGAN

CIVIL ACTION

versus

NO.: 6:21-cv-03993

NOBLE DRILLING (U.S.), LLC
ET AL

DISTRICT JUDGE
ROBERT R. SUMMERHAYS

MAGISTRATE JUDGE
CAROL B. WHITEHURST

RESPONSE TO REMOVAL ORDER

NOW INTO COURT, through undersigned counsel, comes Defendant Noble Drilling (U.S.), LLC (“Noble Drilling”), who, in connection with its Notice of Removal (Rec. Doc. No. 1) and in response to the Removal Order issued by the Court (Rec. Doc. No. 5), submits this pleading:

(1)(a) A list of all attorneys involved in the case and the parties they represent:

- John Craig Jones and Craig Ray Hill, counsel for Plaintiff, Jared Regan
- Robert Kallam, Brad Schlotterer, Sean McLaughlin, Timothy Strickland, Stacey Norstrud, and Taylor Ashworth, counsel for Defendants Noble Drilling (US) LLC, Noble Drilling Holding LLC, and Noble Drilling Services LLC f/k/a Noble Drilling Services Inc.
- Thomas Diaz, Alex Baynham, and Vanessa Anseman, counsel for Defendants, Shell Oil Company and Shell Offshore Inc.

(1)(b) Copies or electronic images of all records and proceedings occurring in the State Court prior to removal, arranged by order of filing date

- See attached Exhibit “A.”

(1)(c) A list of all documents included in the State Court record, arranged by order of filing date

- Stamped Petition for Damages
- Stamped Request for Notice of Trial Date
- Stamped and Signed Order for Trial by Jury
- Citation Return Noble Drilling (U.S.), LLC
- Citation Return Shell Offshore, Inc.

- Citation Return Shell Oil Company
- Citation Return Noble Drilling Services, Inc.
- Citation Return Noble Drilling Holding, LLC
- Notice of Filing Removal with Attachments

(1)(d) A certificate by counsel that the above constitutes the entire State Court record

- See attached certificate Exhibit “B.”

(2)(a) No motions or exceptions were pending in State Court at the time of removal.

(2)(b) No registry funds were on file with the State Court.

Respectfully submitted:

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Pro hac to be applied for

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ATTORNEYS FOR NOBLE DRILLING (U.S.), LLC AND NOBLE
DRILLING SERVICES LLC F/K/A NOBLE DRILLING SERVICES
INC. AND NOBLE DRILLING HOLDING LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this the 8th day of December 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to those who are non-CM/ECF participants.

/s/ Taylor Ashworth